



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

February 23, 2015

Ms. Abigail Low  
GSA Project Manager  
20 N 8<sup>th</sup> Street  
Philadelphia, PA 19107

Re: Draft Supplemental Environmental Impact Statement for U.S. Department of State Foreign Affairs Security Training Center, Nottoway County, Virginia (CEQ #20150000)

Dear Ms. Low:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS) prepared by the General Services Administration (GSA) for the U.S. Department of State (DOS) Foreign Affairs Security Training Center (FASTC) proposed on the property of Fort Pickett in Nottoway County, Virginia. The new study supplements the Draft EIS published in 2012 (2012 DEIS) for the proposed DOS training center and offers the alternative of a smaller footprint and a more reduced-capacity facility than investigated in 2012.

The purpose of the proposed FASTC is to consolidate existing dispersed hard skills training functions into a single suitable location that can provide hard skills training specifically designed to enable personnel to conduct security operations/activities in high-threat environments abroad. The proposed FASTC is needed to improve training efficiency and provide priority access to training venues to meet increased demand for well-trained personnel.

The DSEIS addresses substantial changes to the proposed action as presented in the 2012 DEIS. Specific changes include a reduced scope to include only "hard skills" training venues which consist of high speed driving tracks, weapons firing ranges, mock urban environments, explosives ranges, and associated classrooms and administrative support functions. The DSEIS analyzes the No Action Alternative and Build Alternative 3, the Preferred Alternative. The major differences of Build Alternative 3, as compared with 2012 Build Alternatives 1 and 2, are the locations of the administrative area (Core Area) and the consolidation, reduction, or elimination of several training venues and support facilities. Build Alternative 3 includes three



site parcels (Parcel 21/20, Grid Parcel, and LRA Parcel 9) and several areas to be shared with the Army National Guard (ARNG).

EPA appreciates the coordination performed by GSA in their effort to respond to comments and recommendations made by EPA on the 2012 DEIS, and allowing EPA to participate in the preparation of the DSEIS. EPA has rated the DSEIS an EC-1 (Environmental Concerns/Adequate) which indicates that environmental impacts have been identified through the study and appropriate mitigation will be required; the DSEIS addresses the environmental impacts, but the addition of clarifying information would be helpful. A copy of EPA's rating system is enclosed for your information. EPA is asking for minor clarifications regarding wetlands/vegetation and hazardous areas; recommendations are included in the Technical Comments document (enclosed) for your consideration. EPA appreciates the modifications to alternatives that have minimized impacts to natural resources including reducing impacts to wetlands from the 6.5 acres of wetland impacts in the 2012 DEIS to approximately 5 acres. Any further effort during design to further minimize impacts to natural resources is encouraged.

Thank you for the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765 or [delgrosso.karen@epa.gov](mailto:delgrosso.karen@epa.gov).

Sincerely,



Barbara Rudnick  
NEPA Team Leader  
Office of Environmental Programs

Enclosure (2)



## **Technical Comments**

### **Aquatic Resources**

Page 3-1 states, "In addition, 12 acres between Parcel 21/20 and Dearing Avenue is included in the affected environment descriptions for Parcel 21/20 because the land is immediately adjacent to the parcel. The site also includes use of 19 acres at Fort Pickett Range 8. Because no construction is proposed for this area, it is not included in the affected environment of the site unless resources are present that could be affected by the additional use." When looking at Figure 4.1-1, Direct and Indirect Wetland Impacts Parcel 21/20 Build Alternative 3, it appears as though there may be direct wetland impacts on the 12 acres between Parcel 21/20 and Dearing Avenue. Please clarify.

The impact to vegetation includes a total of 406 acres (365 forest and 41 shrub/grass). Proposed restoration includes 180 acres of vegetation and 87 acres of forest. As discussed with GSA in a meeting on 11/25/14, it was understood that forested wetlands would be mitigated at a 2-1 ratio. Of the approximate 5.72 acres of wetland impacts, approximately 5 acres are forested wetlands. The EIS does not state that mitigation of forested wetlands would be at a 2:1 ratio. Please discuss to ensure that compensation for loss would be mitigated appropriately.

As EPA and the Corps have indicated, the aquatic resources onsite and the proposed impacts should be fully characterized, and all impacts to aquatic resources should be avoided and minimized to the maximum extent practicable. Characterization of the resource includes providing information on the resource type, its condition and its function and values in the watershed. This includes wetlands and biological evaluation of streams. This is needed to fully assess the environmental impact of the loss of the resource and to determine appropriate compensatory mitigation to replace lost functions in the watershed. We appreciate that GSA has engaged the Corps and EPA in discussing these issues.

### **Hazardous Areas**

EPA questioned the three unlabeled 50-gallon drums on the property at 507 Garnett Avenue that were believed to contain soils associated with the environmental investigation conducted at site EBS 115. GSA responded, "These drums were not observed during the 2012 follow up environmental assessment investigations and are assumed to have been removed (Cardno TEC 2013a)." Although the drums are no longer on the site, GSA did not address the soils on site to determine if there may be a need to assess or sample for potential contamination.

Page 4-74 states, "Nottoway County will be notified of the release discovered and delineated at Building 1100 during the follow up environmental assessment investigations conducted in December 2012 (Cardno TEC 2013a)." What was discovered at the follow up investigation? Please provide results.



### **Miscellaneous**

The following page/figure references in GSA's responses to EPA's comments may be changed to accurately reflect text. Response F2-E states, "Page 3-20 of the Supplemental Draft EIS has been revised for clarification." The page reference should be Page 3-22.

Response F2-H states "Section 3.2.3.4, Baseline Risk Areas on page 3-59...." The page referenced should be page 3-57.

Response F2-H states, "Figures 4.2-5 through 4.2-10...." should be Figures 4.2-1 through 4.2-4.

Response F2-L states, "The PA-39 release area is located north and east of the Grid parcel at a motor pool; it has been depicted on Figure 3.2-16...." The figure referenced should be Figure 3.2-17.

Response F2-X states, "Additional text has also been added to Sections 2.2.3.2, 2.2.3.3, 6.3 and Tables ES-2 and 6.15.1 of this Supplemental Draft EIS." The correct section referenced should be Section 2.2.2.2 and the table referenced should be Table 6.16.1.

